

Dear colleagues,

CONSUMER SCOTLAND RESPONSE TO OFCOM CONSULTATION ON 2025-26 DRAFT PLAN OF WORK

Thank you for the opportunity to respond to Ofcom's 2025-26 Draft Plan of Work.

I have set out in this letter Consumer Scotland's feedback on the Draft Plan, which I will hope will be of value to you as you finalise your activities for the coming year.

Consumer Scotland has valued our engagement with Ofcom over the past 12 months. In particular, we have been pleased to work with Ofcom in relation to changes to the Universal Service Obligation for postal services, mid-contract price rises for telecoms services, and the impact of the PTSN switchoff on consumers in Scotland and on associated plans to enhance network and infrastructure resilience. We look forward to continuing to work together to achieve positive outcomes for consumers in Scotland during 2025-26. We particularly welcome the commitments made by Ofcom in the Plan of Work to ensuring that consumers are treated fairly at every stage of the customer journey, regardless of their circumstances; and that consumers can access high-quality, reliable and secure networks and services where they are needed.

Consumer Scotland recently published our own Draft Work Programme for 2025-26. In this Programme we set out our planned work for the year ahead, under across four overarching outcomes:

- Fair and affordable markets
- Investing for the future
- Trustworthy, high quality goods and services
- Consumers at the heart of Scotland's economy and society

Our Programme sets out our proposed research, analysis, policy, advocacy and strategic partnerships activities for the year ahead, alongside our statutory roles on the Consumer Duty for public bodies in Scotland, our recall of goods function and the next steps in our planned investigations on behalf of consumers. We receive levy funding for our work in the gas, electricity, heat network post and water sectors and we also undertake work across the wider consumer economy.

Across that set of activities, and considering Ofcom's Plan of Work, there are a number of opportunities for Consumer Scotland and Ofcom to work together over the next year. We would be particularly keen to engage closely with Ofcom on your proposed work in the following areas:

- The managed transition away from legacy services such as traditional public switched telephone network (PSTN) landline telephony and 2G/3G mobile networks. We continue to have concerns

about the impact of the migration to digital landlines on consumers in Scotland and we are carrying out ongoing advocacy work including engagement with communications providers and the UK and Scottish Governments. This has clear links to planned Ofcom work considering the interests of rural and island communities in Scotland in affordable, resilient connectivity, including monitoring how the rollout of new technologies sits alongside the withdrawal of legacy technologies.

- Ongoing work aimed at ensuring that consumers in vulnerable circumstances are treated fairly, that services are affordable and that consumers can access redress under approved ADR schemes. We also welcome ongoing monitoring of levels of customer service and compliance with consumer protection rules.
- The ongoing work related to reforming the Universal Service Obligation for postal services. We are keen to ensure that any proposed changes respond effectively to consumer needs, including in relation to the affordability, value for money and reliability of postal services and that due consideration is given to consumers who may be most impacted, such as those who are digitally excluded or in rural locations.
- Consumer Scotland will be taking forward a research project on postal services in island communities across Scotland in 2025/26. We will also be undertaking work to consider the longer-term future of postal services in Scotland to ensure that future postal services continue to meet the needs of all consumers. We would welcome engagement with Ofcom as this work develops.

More broadly, looking across Ofcom's Draft Work Plan for 2025-25, we would encourage Ofcom to:

- Continue to engage with the telecommunications and postal industries to develop their understanding of net zero and climate change issues and to support and contribute to the advancement of net zero objectives.
- Continue to work to ensure that a choice of affordable, high quality internet and mobile phone services are available to consumers across the UK, including those in "hard to reach" areas
- Recognise the social value of post for consumers in Scotland, including its role in providing a safety net for accessing essential services, supporting social cohesion and connection, and supporting local economic activity, including for small businesses.
- Ensure that there is consideration of the needs of both digitally excluded and rural and island consumers within any reforms to the Universal Service Obligation for postal services. This includes consideration of Quality of Service standards for rural areas.
- Consider the longer-term future of postal services beyond the immediate changes required to the Universal Service Obligation to ensure postal services work for consumers both now and into the future.

I hope these comments are helpful and we look forward to continuing to work with Ofcom during 2025-26.

Yours sincerely,

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